

**MADEL PA**

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*Attorneys for Defendant Portfolio Recovery  
Associates, LLC*

**U.S. DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF CALIFORNIA**

JESSE MEYER, an individual, on his  
own behalf and on behalf of all others  
similarly situated,

Plaintiff,

v.

PORTFOLIO RECOVERY  
ASSOCIATES, LLC,

Defendant.

Case No.: 3:11-CV-01008-JAH-  
BGS

**JOINT MOTION TO  
DISMISS ACTION WITH  
PREJUDICE**

**IT IS HEREBY STIPULATED AND AGREED**, by and between the parties to *Jesse Meyer, an individual, on his own behalf and on behalf of all others similarly situated v. Portfolio Recovery Associates, LLC*, 3:11-CV-01008-JAH-BGS (“the *Meyer* action”), namely Plaintiff Jesse Meyer and Defendant Portfolio Recovery Associates, LLC, through their respective counsel, that the *Meyer* action, including all claims and counterclaims that were or might have been asserted in the *Meyer* action, may be and hereby are dismissed, pursuant to Federal Rule of Civil

1 Procedure 41(a)(1)(A)(ii), with prejudice and with each party to bear its own costs  
2 and attorneys' fees.

3 The parties to the *Meyer* action respectfully request the Court to terminate  
4 the *Meyer* action by valid order pursuant to this Joint Motion to Dismiss with  
5 Prejudice, vacate any pending deadlines or hearings in the *Meyer* action, and to  
6 direct the Clerk of this Court to transmit a copy of the same to the Clerk of the  
7 United States Judicial Panel on Multidistrict Litigation. *See* J.P.M.L. Rule 10.1  
8 (“Where the transferee district court terminates an action by valid order, including  
9 but not limited to summary judgment, judgment of dismissal and judgment upon  
10 stipulation, the transferee district court clerk shall transmit a copy of that order to  
11 the Clerk of the Panel. The terminated action shall not be remanded to the  
12 transferor court and the transferee court shall retain the original files and records  
13 unless the transferee judge or the Panel directs otherwise.”).

14  
15  
16 DATED: January 8, 2024

**MADL PA**

17  
18 By: s/ Jennifer M. Robbins  
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**Attorneys for Defendant**

**PRESTON LAW OFFICES**

DATED: January 8, 2024

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**Attorney for Plaintiff**

**CERTIFICATE OF SERVICE**

I, Jennifer M. Robbins, counsel for Defendants, hereby certify that service of the foregoing JOINT MOTION TO DISMISS WITH PREJUDICE AND PROPOSED ORDER was filed electronically and sent via e-mail through the CM/ECF system to the following:

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DATED: January 8, 2024

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